ORIGINAL

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
JUN 21 2018
11:45 am
CLERK, U.S. DISTRICT COURT
By _____ Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JESUS GERARDO LEDEZMA-CEPEDA, et al

No. 4:14-CR-151-Y
[Filed Under Seal]

GOVERNMENT'S MOTION TO UNSEAL FOURTH SUPERSEDING INDICTMENT AS IT RELATES TO DEFENDANT RAMON VILLARREAL-HERNANDEZ

The United States Attorney for the Northern District of Texas, files this Motion requesting the Court unseal the attached Fourth Superseding Indictment in its redacted form, leaving all information relating to defendants not apprehended sealed.

Defendant Ramon Villarreal Hernandez has been apprehended; therefore the government requests the unsealing as to his name in the fourth superseding indictment at this time.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

AISHA SALEEM
Assistant United States Attorney
Texas State Bar No. 00786218
801 Cherry Street, Suite 1700
Fort Worth, Texas 76102
Telephone: 817.252.5200
Facsimile: 817.252.5455
Email: aisha.saleem@usdoj.gov

ORIGINAL

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
JUN 20 2018
CLERK, U.S. DISTRICT COURT
By _____
Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

RAMON VILLARREAL HERNANDEZ (05)
a/k/a "El Mon" and "Gabino"

No. 4:14-CR-151-Y
[Supersedes Indictment returned on October 18, 2017]
[Filed Under Seal]

FOURTH SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One
Interstate Stalking
(Violation of 18 U.S.C. § 2261A and § 2)

Beginning on or about March 1, 2011, and continuing until on or about May 22, 2013, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants **Ramon Villarreal Hernandez**, also known as El Mon and Gabino, and the following who are not named as defendants herein: Jesus Gerardo Ledezma-Cepeda, also known as Chuy and Juan Ramos, Jesus Gerardo Ledezma-Campano and Jose Luis Cepeda-Cortes, traveled in interstate and foreign commerce from Mexico and elsewhere,

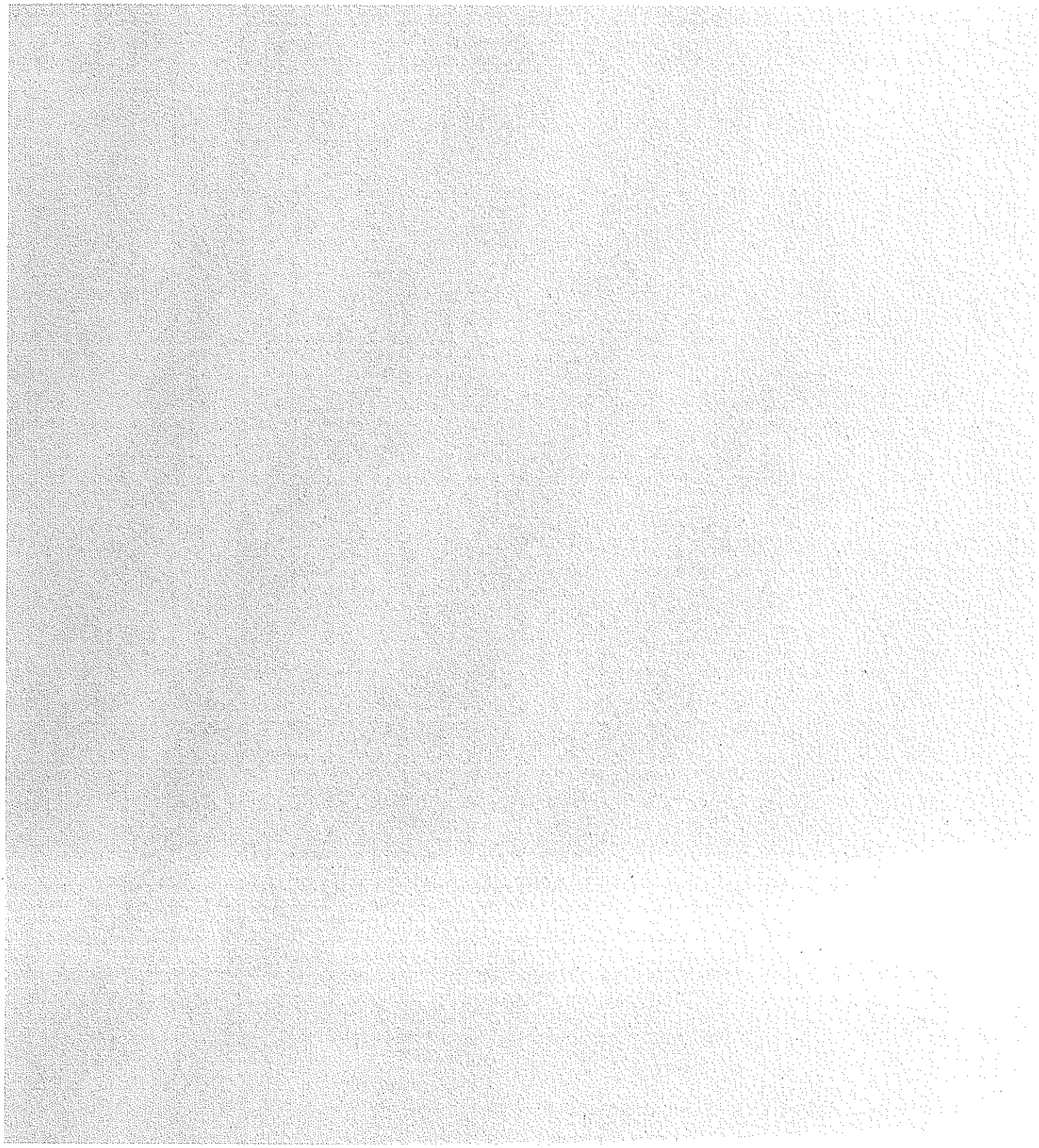
to Southlake, Texas, and elsewhere, with the intent to kill, injure, harass and intimidate J.J.G.C., and in the course of and as a result of such travel placed J.J.G.C. in reasonable fear of the death of and serious bodily injury to J.J.G.C., and in the course of and as a result of such travel, the death of J.J.G.C. resulted.

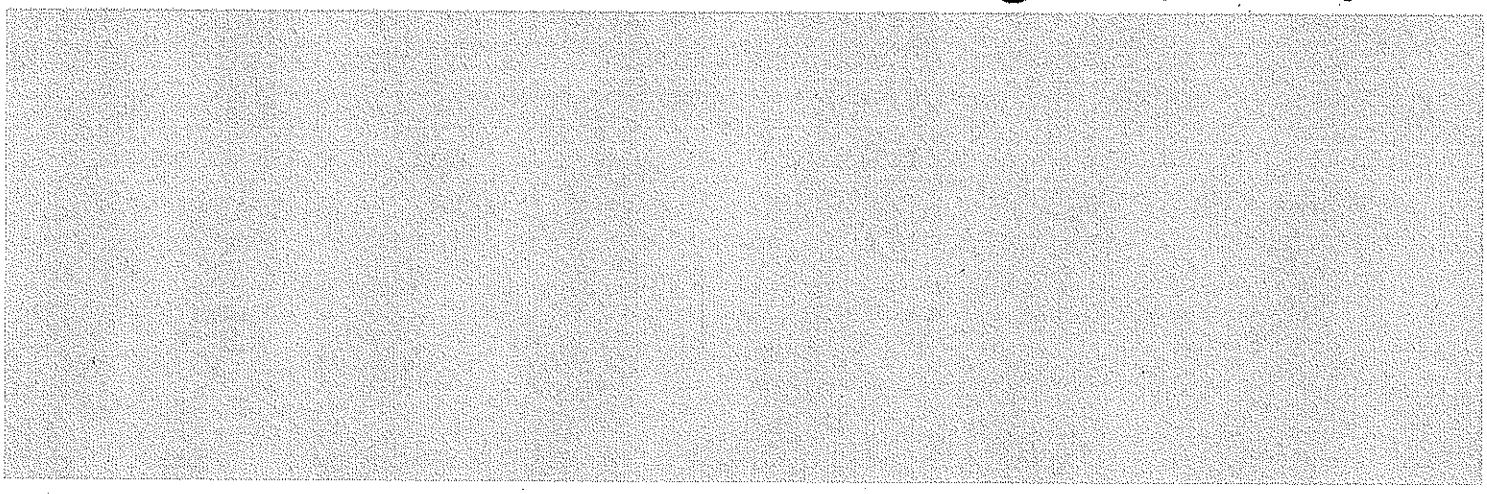
In violation of 18 U.S.C. § 2261A and § 2.

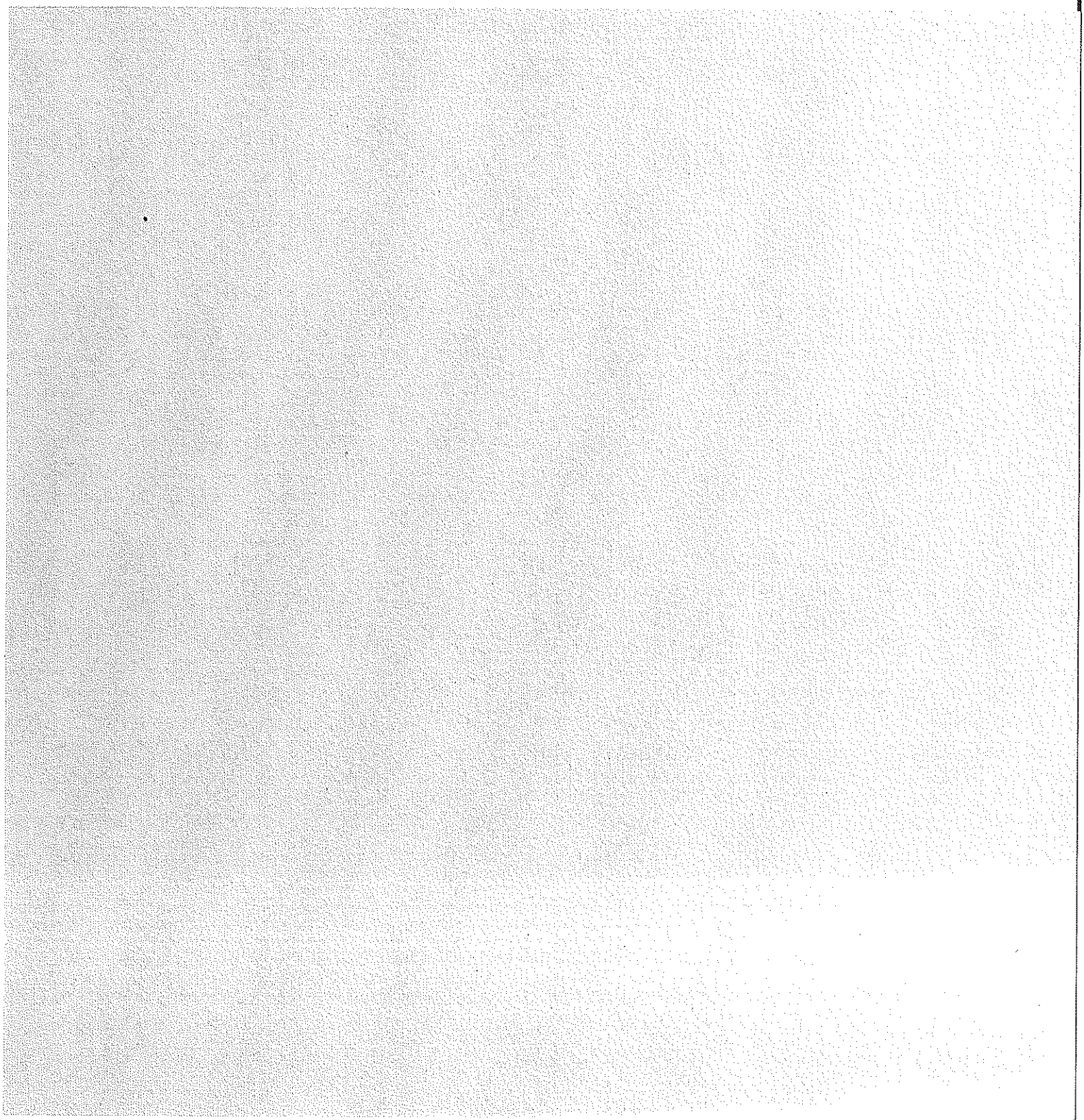
Count Two
Conspiracy to Commit Murder for Hire
(Violation of 18 U.S.C. § 1958)

Beginning on or about March 1, 2011, and continuing until on or about September 5, 2014, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants [redacted] **Ramon Villarreal Hernandez**, also known as El Mon and Gabino, [redacted] and the following who are not named as defendants herein: Jesus Gerardo Ledezma-Cepeda, also known as Chuy and Juan Ramos, Jesus Gerardo Ledezma-Campano, and Jose Luis Cepeda-Cortes, and others, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to travel in interstate and foreign commerce from Mexico and elsewhere, to Southlake, Texas, and elsewhere, with the intent to murder J.J.G.C., in violation of the laws of Texas, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, and which offense resulted in the death of J.J.G.C.

In violation of 18 U.S.C. § 1958.







A TRUE BILL.

FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY

AISHA SALEEM
Assistant United States Attorney
Texas State Bar No. 00786218
801 Cherry Street, Suite 1700
Fort Worth, Texas, 76102
Telephone: 817-252-5200
Facsimile: 817-252-5455

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

v.

RAMON VILLARREAL HERNANDEZ (05)
a/k/a "El Mon" and "El Gabino"

FOURTH SUPERSEDING INDICTMENT

18 U.S.C. § 2261A and § 2
Interstate Stalking
(1 COUNT)

18 U.S.C. § 1958
Conspiracy to Commit Murder for Hire
(1 COUNT)

A true bill rendered

FORT WORTH FOREPERSON

Filed in open court this 20th day of June, 2018.

Warrant to be issued on all defendants.

UNITED STATES MAGISTRATE JUDGE